

REMARKS

The present application was filed on February 25, 2004 with claims 1-20. In the outstanding Office Action, the Examiner required restriction of claims 1-20 of the above-referenced application to one of the following groups of claims: claims 1-17 (Group I); claim 18 (Group II); and claims 19 and 20 (Group III).

The Examiner argues that the inventions are distinct because the method, apparatus and article of manufacture for performing a wire bonding operation do not require circuit elements disposed within an integrated circuit package as recited in claim 18. Additionally, the Examiner contends that the method for performing a wire bonding operation can be practiced by hand. Applicants respectfully disagree with these contentions and respectfully request reconsideration and withdrawal of the requirement for restriction for at least the reasons given below.

Applicants submit that the integrated circuit set forth in claim 18 cannot be made by a process that is materially different from the method set forth in claim 1, and that the method of claim 1 cannot be used to form a product materially different from the integrated circuit set forth in claim 18. Claim 18 recites an integrated circuit having wire bonds formed by a method also recited in claim 1. The mere presence of circuit elements in the integrated circuit package of claim 18 fails to distinguish it from the product of method claim 1. Circuit elements are a required in order to define an integrated circuit, and their inclusion does not result in a materially different product. Furthermore, circuit elements are specifically recited as elements in the integrated circuit in claims 10-14 and 16, which are dependent from method claim 1.

Applicants also submit that the process of the apparatus and article of manufacture set forth in claims 19 and 20 cannot be performed by a process that is materially different from the method set forth in claim 1. As is commonly known in the art, due to the extremely small tolerances involved in wire-bonding operations of an integrated circuit, it is not possible to perform such a wire-bonding process "by hand."

As apparent from independent claims 1 and 18-20, each of the steps recited in the method of claim 1 has a corresponding element in the integrated circuit set forth in claim 18, the apparatus set forth in claim 19, and the article of manufacture set forth in claim 20. Accordingly, the

inventions set forth in the subject claims are properly linked to one another, and the required search would not be divergent. Applicants assert that, in the interest of conservation of resources for the Patent Office as well as the Applicants, claims 1-20 should be examined together. Withdrawal of the restriction requirement in the present application is respectfully solicited.

In the event the outstanding restriction requirement is not withdrawn, Applicants hereby elect with traverse the claims of Group I, i.e., claims 1-17, for prosecution on the merits.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert W. Griffith", written in a cursive style.

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